FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) Renewal OFFICE OF AIR QUALITY

Slater Steels
Fort Wayne Specialty Alloys Division
2400 Taylor Street West
Fort Wayne, Indiana 46802

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F003-14978-00011	
Issued by: Original Signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: July 26, 2002 Expiration Date: July 26, 2007

SECTION D.6 FACILITY OPERATION CONDITIONS

Insignificant Activities

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.6.1 Particulate Matter (PM) [326 IAC 6-3-2]

Compliance Determination Requirements

D.6.2 Preventative Maintenance Plan [326 IAC 2-8-4(9)]
D.6.3 Testing Requirements [326 IAC 2-7-6(1),(6)]
D.6.4 Particulate Matter (PM)

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.6.5 Baghouse Inspections [326 IAC 2-7-21(1)(G)
D.6.6 Visible Emissions Notations

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.6.7 Record Keeping Requirements

Quarterly Report (Metal Finishing Rate)
Quarterly Report (Natural Gas Usage)
Certification
Emergency Occurrence Report
Quarterly Deviation and Compliance Monitoring Report Form

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary rolling and finishing operation for the manufacture of stainless steel products.

Authorized individual:	Bruce Kennedy
Source Address:	2400 Taylor Street West, Fort Wayne, Indiana 46802
Mailing Address:	P.O. Box 630, Fort Wayne, Indiana 46801
SIC Code:	3312
Source Location Status:	Allen County
County Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Synthetic Minor Source, FESOP Program, 1 of 28 Listed Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

(a) Primary Mill

(1) one (1) ingot grinding operation (ID# B1). This operation has a maximum capacity of 10.27 tons per hour, is equipped with a dust collection house ID# E4, and exhausts through vent E4;

(2) eight (8) natural gas-fired preheat charge furnaces (ID#s B2a through B2h). The total maximum preheat capacity through all 8 furnaces is 10.27 tons per hour. Each furnace has a maximum heat input capacity of 31.6 million Btu per hour. The furnaces are not equipped with an air pollution control device and exhaust into the building;

(3) four (4) natural gas-fired annealing furnaces (ID#s B4a through B4d). The total maximum annealing capacity through all 4 furnaces is 10.27 tons per hour. Each furnace has a maximum heat input capacity of 13.0 million Btu per hour. The furnaces are not equipped with an air pollution control device and exhaust into the building.

(b) Billet Conditioning

(1) one (1) dry grinding operation (ID# C3). This operation has one grinding station and has a total maximum capacity of 1.6 tons per hour. This operation is not equipped with any air pollution control device, and exhausts through vent E6;

(2) one (1) CMI grinder (ID# C5). This grinder has a maximum capacity of 1.60 tons per hour, is equipped with a baghouse (ID# E8a), and exhausts into the building; and

(3) one (1) billet shot blasting operation (ID# C4). This operation has a maximum processing capacity of 4.0 tons of billets per hour, is equipped with a baghouse (ID# E9), and exhausts through stack E9.

(c) Continuous Bar Mill and Annealing

(1) one (1) CBM cut-off saw (ID# D2). This saw has a maximum processing capacity of 5.14 tons of bars per hour, is equipped with a baghouse (ID# E10), and exhausts through stack E10; and

(2) one (1) natural gas-fired annealing furnace (ID# D3). This furnace has a maximum heat input capacity of 13.9 million Btu per hour, is not equipped with any air pollution control device, and exhausts into the building.

(d) Cold Finishing

(1) one (1) passivation system (ID# E3). This system has a maximum capacity of 4.0 tons of stainless steel bars per hour, is equipped with a mist eliminator (ID# E12), and exhausts through stack E12;

(2) one (1) old bar shot blasting operation (ID# E6). This operation has two blasting stations with a total maximum capacity of 1.83 tons of stainless steel bar per hour, is equipped with a baghouse (ID# E15), and exhausts inside the building; and

(3) one (1) #1 shot blasting operation (ID# E7). This operation has a maximum capacity of 1.83 tons of stainless steel bar per hour, is equipped with a baghouse (ID# E16), and exhausts inside the building.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) three (3) natural gas-fired boilers (ID#s 2, 3, and CDC boiler), with maximum heat input capacities less than or equal to 10.0 million Btu per hour (These insignificant units have applicable requirements in section D.5) [326 IAC 6-2-3];

(b) natural gas-fired heat treat furnaces with heat input capacities less than or equal to 10 million Btu per hour;

(c) combustion source flame safety purging start up;

(d) a gasoline transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons;

(e) a petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month;

(f) vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;

(g) refractory storage not requiring air pollution control equipment;

(h) application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings;

(i) machining where an aqueous cutting coolant continuously floods the machining interface;

(j) cleaners and solvents characterized as follows:

(1) having a vapor pressure equal to or less than 2 kilopascals; 15 mm Hg; or 0.3 psi measured at 38 C (l00 F); or

(2) having a vapor pressure equal to or less than 0.7 kilopascal; 5 mm Hg; or 0.1 psi measured at 20 C (68 F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months;

(k) closed loop heating and cooling systems;

(l) forced and induced draft noncontact cooling tower system not regulated under a NESHAP;

(m) quenching operations used with heat treating processes;

(n) replacement or repair of electrostatic precipitators, bags in baghouses, and filters in other air filtration equipment;

(o) heat exchanger cleaning and repair;

(p) process vessel degassing and cleaning to prepare for internal repairs;

(q) paved roads and parking lots with public access;

(r) equipment used to collect any material that might be released during a malfunction, process upset, or spill clean up, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment;

(s) blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling tower;

(t) furnaces used for melting metal other than beryllium with a brim full capacity of less than or equal to 450 cubic inches by volume;

(u) a laboratory as defined in 326 IAC 2-7-1;

(v) safety clean parts washers for maintenance work;

(w) electro slag remelt operation;

(x) noncontact cooling towers used with chiller systems (no chromates);

(y) grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations;

(z) any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs; and

(aa) the Continuous Draw Cell (CDC) Line, which includes a precoat operation, a draw bench operation, an initial alkaline cleaning operation, a straightening operation, a sawing operation, chamfering operation, an intermediate alkaline cleaning operation, an oxidizing operation, and a final alkaline cleaning operation. (This insignificant activity has applicable requirements in section D.6).

(1) The precoat operation utilizes a calcium hydroxide (lime) aqueous solution, which does not contain any VOC or HAP, to protect the steel bars during the drawing operation.

(2) The draw bench operation uses small amount of oil, a nonvolatile material, to protect the drawing dies from scratching.

(3) The three (3) alkaline operations utilize HAP-free aqueous solutions containing 1% by weight of VOC.

(4) The sawing operation is attached to a baghouse (ID# CDC-BH) that has a design maximum outlet grain loading of 0.0004 gr/dscf and a gas flow rate of 2,942 actual cubic feet of air per minute.

(5) The oxidizing operation uses nitric acid solution to oxidize the surface of stainless steel bars. It is designed with water curtains as an integral part of the process to recover and neutralize nitric acid fumes and to prevent cross contamination with the intermediate and final alkaline cleaning operations.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air

Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

A.6 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised, or

(3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.4 Enforceability [326 IAC 2-8-6]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM*,* the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the sources existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)] [326 IAC 2-8-5(a)(4)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the authorized individual as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the authorized individual as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality.[326 IAC 2-8-4(5)(E)]

(c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; and

(3) Denial of a permit renewal application.

(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in condition B, Emergency Provisions.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain

certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.

(c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source=s compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

(5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the authorized individual as defined by 326 IAC 2-1.1-1(1).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

(b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the authorized individual as defined by 326 IAC 2-1.1-1(1).

(d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.14 Emergency Provisions [326 IAC 2-8-12]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance

Section) or,

Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

Failure to notify IDEM, OAQ by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the authorized individual as defined by 326 IAC 2-1.1-1(1).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.

The notification by the Permittee does require the certification by the authorized individual as defined by 326 IAC 2-1.1-1(1).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

A Permittee=s failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

(c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and

reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the authorized individual as defined by 326 IAC 2-1.1-1(1).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the authorized individual as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(2) If IDEM, OAQ upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source=s failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should certified by the authorized individual as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15]

(a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management

Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional conditions:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the authorized individual@ as defined by 326 IAC 2-1.1-1.

(c) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).

(d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.20 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittees right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action, or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period.

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the sources potential to emit does not exceed the above specified limits.

(c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in

accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Natural Gas Usage Limitation [326 IAC 2-8-4(1)]

The total natural gas usage for Slater Steels shall be limited to 1.5 billion cubic feet per 12 consecutive month period rolled on a monthly basis. This fuel usage limitation was taken by the company and is equivalent to NO_x emissions of 75.0 tons per 12 consecutive month period from natural gas combustion units only.

Due to the above limitation, the Part 70 (326 IAC 2-7) rules do not apply.

C.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.8 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC

1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d)(3), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.

C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require

notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.10 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any

applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the authorized individual as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the authorized individual as defined by 326 IAC 2-1.1-1(1).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.11 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.12 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

C.14 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

(a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ("2%) of full scale reading.

(b) Whenever a condition in this permit requires the measurement of a (temperature, flow rate, or pH level), the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ("2%) of full scale reading.

(c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.15 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

(a) A compliance schedule for meeting the requirements of 40 CFR 68; or

(b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40

CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

(c) A verification to IDEM, OAQ, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

All documents submitted pursuant to this condition shall include the certification by the authorized individual as defined by 326 IAC 2-1.1-1(1).

C.16 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and is comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are

not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall constitute a violation of the permit.

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

(e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) When the results of a stack test performed in conformance with Section C.10 - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do not require the certification by the authorized individual as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.18 Natural Gas Usage

The Permittee shall maintain monthly records of source-wide natural gas usage and natural gas usage for the previous12 months. This shall determine on-going compliance with operation condition C.6 - Natural Gas Usage Limitation.

C.19 Quarterly Reporting

The Permittee shall submit within thirty (30) days after the end of the quarter being reported a summary to document compliance with operation condition C.6 - Natural Gas Usage Limitation, using the enclosed form or its equivalent. The report shall include the source-wide monthly natural gas usage and the natural gas usage for the previous 12 months, for each month in a
quarter.

C.20 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

(a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.21 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

(a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the authorized individual as defined by 326 IAC2-1.1-1(1).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the

envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(d) Unless otherwise specified in this permit, any quarterly or semi-annual report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The report does require the certification by the authorized individual@ as defined by 326 IAC 2-1.1-1(1).

(e) Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.22 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156

(b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]

(a) Primary Mill

(1) One (1) ingot grinding operation (ID#B1). This operation has a maximum capacity of 10.27 tons per hour, is equipped with a dust collection house ID#E4, and exhaust through vent E4;

(2) Eight (8) natural gas -fired preheat charge furnaces (ID# B2a through B2h). The total maximum preheat capacity through all 8 furnaces is 10.27 tons per hour. Each furnace has a maximum heat input capacity of 31.6 million Btu per hour. The furnaces are not equipped with an air pollution control device and exhaust into the building;

(3) Four (4) natural gas-fired annealing furnaces (ID#s B4a through B4d). The total maximum annealing capacity through all 4 furnaces is 10.27 tons per hour. Each furnace has a maximum heat input capacity of 13.0 million Btu per hour. The furnaces are not equipped with an air pollution control device and exhaust into the building.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Particulate Matter (PM) [326 IAC 6-3-2] [326 IAC 2 2]

Pursuant to 326 IAC 6-3-2 (Particulate emission limitations for process operations), the allowable particulate matter (PM) emissions from the primary mill (charging furnaces, annealing furnaces and ingot grinding) operations shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour
= 10.27 TPH

(1) Ingot grinding (ID#B1) shall not exceed 19.5 lbs/hr.
(2) Charge and Annealing Furnaces shall not exceed 19.5 lb/hr

D.1.2 Nitrogen Oxide (NOx)

Pursuant to 326 IAC 2-8, the total nitrogen oxide (NOx) emissions from the primary mill furnaces, ingot grinding and CBM annealing furnace is limited to 9.95 lb/hr such that the NOx PTE of the entire source is limited to less than one hundred (100) tons per year.

To comply with this NOx limit the source has accepted a federally enforceable annual natural gas limit not to exceed 1,500 million cubic feet per 12 consecutive month period rolled on a monthly basis.

Compliance Determination Requirements

D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventative Maintenance Plan, in accordance with Condition B.13 of this permit, is required for the ingot grinding operation, preheat charge furnaces, and annealing furnaces and associated controls.

D.1.4 Particulate Matter (PM)

Pursuant to CP-003-9460-00011, issued on September 17, 2001, and in order to comply with D.1.1, the dust collection house for PM control shall be in operation at all times when the ingot grinding process is in operation.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.5 Visible Emissions Notations

(a) Visible emissions notations of exhaust vent E4 for the ingot grinding operation shall be performed once per shift when the process is in operation during normal daylight operations when exhausting directly to the atmosphere. A trained employee will record whether emissions are normal or abnormal.

(b) For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C.16 - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.1.6 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the grinding dust from the dust collection house vent (E4) while the grinders are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the grinding dust emissions from the stack and the presence of grinding dust on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in grinding dust emission, or evidence of grinding dust emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.7 Record Keeping Requirements

To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (a) through (c) below. Records maintained for (a) through (c) shall be taken

daily, unless otherwise specified herein, and shall be complete and sufficient to establish compliance with the PM and NO_x emissions limits established in Condition D.1.1 and D.1.2.

(a) check integrity of dust collection house;

(b) visible emissions observations shall be taken once per shift; and

(c) checklist with dates and initials for each Preventative Maintenance Plan action performed.

All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.8 Quarterly Reporting

A quarterly summary of the information to document compliance with Condition D.1.2 (natural gas usage) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]

(b) Billet Conditioning

(1) One (1) billet grinding operation (ID# C3). This operation has one grinding station and has a total maximum capacity of 1.6 tons per hour. This operation is not equipped with any air pollution control device, and exhaust through vent E6;

(2) One (1) CMI grinder (ID# C5). This grinder has a maximum capacity of 1.6 tons per hour, is equipped with a baghouse (ID#E8a), and exhaust into the building; and

(3) One (1) billet shot blasting operation (ID#C4). This operation has a maximum processing capacity of 4.0 tons per hour, is equipped with a baghouse (ID#E9), and exhaust through stack E9.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Particulate Matter [326 IAC 6-3-2] [326 IAC 2-2]

Pursuant to 326 IAC 6-3-2 (Particulate emission limitations for process operations), the allowable particulate matter (PM) emissions from the dry grinding operation, CMI grinder and billet shot blasting operation, shall not exceed the following limitations:

This limit is determined by the following equation: $E = 4.1 \times (P ^ {0.67})$
Where: P = process weight in tons/hr

Operation	326 IAC 6-3-2 Limits (lbs/hr)	P (TPH)
Billet Grinding (ID#C3)	5.62	1.6
CMI Grinder (ID#C5)	5.62	1.6
Billet Shot Blasting (CD#C4)	10.4	4.0

Compliance Determination Requirements

D.2.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

(a) A Preventative Maintenance Plan, in accordance with Condition B.13 of this permit, is required for the billet shot blasting operations.

(b) The Permittee shall have 30 days from the issuance of this permit to implement a Preventative Maintenance Plan, make modifications to equipment and install pressure monitoring equipment required in D.2.6 of this permit.

D.2.3 Particulate Matter (PM)

Pursuant to CP-003-9460-00011, issued on September 17, 2001, and in order to comply with D.2.1, the baghouses for PM control shall be in operation at all times when the CMI grinder and the billet shot blasting process is in operation.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.2.4 Baghouse Inspections [326 IAC 2-7-21(1)(G)(xxix)(FF)

An inspection shall be performed each calendar quarter of all bags controlling the CMI grinder and billet shot blasting operations when venting directly to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents directly to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.2.5 Visible Emissions Notations

(a) Visible emissions notations of CMI grinder exhaust (ID# E8a) and the billet conditioning stack (E 9) shall be performed once per shift when the process is in operation during normal daylight operations when exhausting directly to the atmosphere. A trained employee will record whether emissions are normal or abnormal.

(b) For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C.16 - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.2.6 Monitoring

The Permittee shall record the total static pressure drop across the bag houses controlling the CMI grinding and billet shot blasting operations at least once per shift when the process is in operation during normal daylight operations when venting directly to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 1.0 and 4.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan -Failure to Take Response. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C.16 - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instruments Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.2.7 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8)

business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.8 Record Keeping Requirements

To document compliance with Conditions D.2.1, the Permittee shall maintain records in accordance with (a) through (d) below. Records maintained for (a) through (d) shall be taken daily, unless otherwise specified below, and shall be complete and sufficient to establish compliance with the PM emissions limits established in Condition D.2.1.

(a) Pressure drop (inlet/outlet differential static pressure) across each baghouse shall be taken once per shift;

(b) visible emissions observations shall be taken once per shift; and

(c) Once per shift external baghouse unit, ductwork and associated components visible emissions observations;

(d) checklist with dates and initials for each Preventative Maintenance Plan action performed

Records of corrective actions shall be kept on a form approved by IDEM and shall be kept for at least 5 years and made available upon IDEM's request.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)

(c) Continuous Bar Mill

(1) One(1) CBM cut-off saw (ID#D2). This saw has a maximum processing capacity of 5.14 tons of bars per hour, is equipped with a baghouse (ID#E10), and exhaust through stack E10; and

(2) One (1) natural gas-fired annealing furnace (ID#D3). This furnace has a maximum heat input capacity of 13.9 million Btu per hour, is not equipped with any air pollution control device, and exhaust into the building.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-3-2] [326 IAC 2-2]
Pursuant to 326 IAC 6-3-2 (Particulate emission limitations for process operations), the particulate matter (PM) emissions from the CBM cut-off saw shall not exceed 12.3 pounds per hour.

This limit is determined by the following equation: $E = 4.1 \times (P ^ {0.67})$
Where: P = process weight in tons/hr

Compliance Determination Requirements

D.3.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]
(a) A Preventative Maintenance Plan, in accordance with Condition B.13 of this permit, is required for the CBM cut-off saw and annealing furnace.
(b) The baghouse for PM control shall be in operation and control the PM emissions from the CBM cutoff saw operation at all times that the CBM cutoff saw is in operation.
(c) The Permittee shall have 30 days from the issuance of this permit to implement a Preventative Maintenance Plan, make modifications to equipment and install pressure monitoring equipment required in D Sections of this permit.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.3.3 Baghouse Inspections [326 IAC 2-7-21(1)(G)(xxix)(FF)
An inspection shall be performed each calender quarter of all bags controlling the CBM cut of saw operation when venting directly to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents directly to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.3.4 Visible Emissions Notations
(a) Visible emissions notations of the CBM cut-off saw stack (E- 10) shall be performed once per shift when the process is in operation during normal daylight operations when exhausting directly to the atmosphere. A trained employee will record whether emissions are normal or abnormal.

(b) For processes operated continuously “normal” means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible missions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C.17 - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

D.3.5 Monitoring

(a) The Permittee shall record the total static pressure drop across the baghouses controlling the CBM cut-off saw at least once per shift when the process is in operation during normal daylight operations when venting directly to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the dust collector house shall be maintained within the range of 3.0 to 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C.16 - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(b) The instrument used for determining the pressure shall comply with Section C.15 Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

D.3.6 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.3.7 Record Keeping

To document compliance with Conditions D.3.1 and D.3.2, the Permittee shall maintain records in accordance with (a) through (d) below. Records maintained for (a) through (d) shall be taken daily, unless otherwise specified herein, and shall be complete and sufficient to establish compliance with the PM emissions limits established in Condition D.3.1.

(a) Pressure drop (inlet/outlet differential static pressure) across each baghouse shall be taken at once per shift;

(b) daily visible emissions observations shall be taken once per shift; and

(c) weekly external baghouse unit, ductwork and associated components visible emissions observations;

(d) checklist with dates and initials for each Preventative Maintenance Plan action performed.

Records of corrective actions shall be kept on a form approved by IDEM and shall be kept for at least 5 years and made available upon IDEM's request.

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)

(d) Cold Finishing

(1) One (1) passivation system (ID#E3). This system has a maximum capacity of 4.0 tons of stainless steel bars per hour, is equipped with a mist eliminator (ID#E12), and exhaust through stack E12;

(2) One (1) old bar shot blasting operation (ID#E6). This operation has two blasting stations with a total maximum capacity of 1.83 tons of stainless steel bar per hour, is equipped with a baghouse (ID#E15), and exhaust inside the building; and

(3) One (1) #1 shot blasting operation (ID#E7). This operation has a maximum capacity of 1.83 tons of stainless steel bar per hour, is equipped with a baghouse (ID#E16), and exhaust inside the building; and

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

D4.1 Passivation Rate Limitation

The passivation production for the passivation system will be limited to 35,000 tons of steel per 12 consecutive month period rolled on a monthly basis. This production limit is taken by the company and is equivalent to NOx emissions of 21.49 tons per 12 consecutive month period from the passivation operations only.

D.4.2 Nitrogen Oxides (NOx)

The NOx emissions from the passivation system shall be limited to 1.23 pounds per ton of metal by utilizing a chemical suppression blanket according to the compliance monitoring plan. Therefore, 326 IAC 2-7 (Part 70 Rules) do not apply.

D.4.3 Particulate Matter (PM) [326 IAC 6-3-2] [326 IAC 2-2]

(a) Pursuant to 326 IAC 6-3-2 (Particulate emission limitations for process operations), the particulate matter (PM) emissions from the passivation system, old bar shot blasting operation and #1 shot blasting operation shall not exceed:

This limit is determined by the following equation: $E = 4.1 \times (P ^ {0.67})$
Where: P = process weight in tons/hr

Operation	326 IAC 6-3-2 Limits (lbs/hr)	P (TPH)
Passivation System	10.4	4.0
Old Bar Shot Blast	6.1	1.83
#1 Shot Blast	6.1	1.83

D4.4 Particulate Matter (PM_{10})

Pursuant to 326 IAC 2-8, the particulate matter (PM_{10}) emissions from the Cold Finishing operations shall not exceed the following limitations:

Operation	326 IAC 6-3-2 Limits (lbs/hr)
Passivation System	7.88
Old Bar Shot Blast	0.09
#1 Shot Blast	0.09

Compliance Determination Requirements

D.4.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

(a) A Preventative Maintenance Plan, in accordance with Condition B.13 of this permit, is required for the passivation system, old bar shot blasting and #1 shot blasting.

(b) The baghouse for PM control shall be in operation and control the PM emissions from the CBM cutoff saw operation at all times that the old bar shot blasting and the #1 shot blasting are in operation.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.4.6 Baghouse Inspections [326 IAC 2-7-21(1)(G)(xxix)(FF)

An inspection shall be performed each calendar quarter of all bags controlling the Old Bar Shot Blast and the #1 Shot Blast operations when venting directly to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents directly to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.4.7 Visible Emissions Notations

(a) Visible emissions notations of the baghouses (ID #E15 & #E16)) shall be performed once per shift when the process is in operation during normal daylight operations when exhausting directly to the atmosphere. A trained employee will record whether emissions are normal or abnormal.

(b) For processes operated continuously “normal” means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C.17 - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

D.4.8 Monitoring

(a) The Permittee shall record the total static pressure drop across the baghouses (ID #E15 & E16) controlling the old bar shot and the #1 shot blasting operation at least once per shift when the process is in operation during normal daylight operations when venting directly to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the dust collector house shall be maintained within the range of 3.0 to 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency

and response steps for when the pressure reading is outside of the above mentioned range for any one reading. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C.16 - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(b) The instrument used for determining the pressure shall comply with Section C.15 Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

D.4.9 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions

D.4.10 Daily Monitoring of Surface Tension of Each Passivation Bath

The chemical suppression blanket for NO_x shall be added to each passivation bath at all times when the passivation system is in operation. The Permittee shall daily maintain the surface tension of the passivation bath such that the surface tension does not exceed 24 dynes per centimeter. This is to determine on-going compliance with operation condition D.4.2, in the absence of any NO_x compliance test. The Preventive Maintenance Plan for the passivation system shall contain troubleshooting contingency and corrective actions for when the surface tension is greater than 24 dynes per centimeter for any one reading.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [26 IAC 2-8-16]

D.4.11 Record Keeping

To document compliance with Conditions D.4.3 and D.4.4, the Permittee shall maintain records in accordance with (a) through (d) below. Records maintained for (a) through (d) shall be taken daily, unless otherwise specified herein, and shall be complete and sufficient to establish compliance with the PM and PM_{10} emissions limits established in Condition D.4. and D.4.4.

(a) Pressure drop (inlet/outlet differential static pressure) across each baghouse shall be taken once per shift;

(b) visible emissions observations shall be taken once per shift; and

(c) once per shift external baghouse unit, ductwork and associated components visible emissions observations;

(d) checklist with dates and initials for each Preventative Maintenance Plan action performed

D.4.12 Surface Tension of Each Passivation Bath

The Permittee shall maintain daily records, except on Saturdays, Sundays, and major holidays (i.e., New Years Day, Good Friday, Labor Day, Thanksgiving Day, and Christmas Day) of the surface tension of each passivation bath to determine on-going compliance with operation condition D.4.9.

Records of corrective actions shall be kept on a form approved by IDEM and shall be kept for at least 5 years and made available upon IDEM′s request.

SECTION D.5 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)

Insignificant Activities:

(a) Three (3) natural gas-fired boilers (ID#s 2, 3, and CDC boiler), with maximum heat input capacities less than or equal to 10.0 million Btu per hour. These boilers do not have any air pollution control device and exhaust through stacks E15, E16, and CDC boiler stack, respectively.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

D.5.1 Particulate Matter

(a) Pursuant to 326 IAC 6-2-3 (Particulate Emission Limitations for Indirect Heating Facilities), the particulate matter (PM) emissions from boiler # 2 shall not exceed 0.8 pounds per million Btu. This was based on the following:

Limit = PM(TPY) x 2000(lb/ton) / 8760(hr/yr) x Boiler Capacity(MMBtu/hr)
Where: PM = 0.60 TPY; Boiler Cap. = 3.35 MMBtu/hr

(b) Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Indirect Heating Facilities), the particulate matter (PM) emissions from # 3 and CDC boilers shall not exceed 0.6 pounds per million Btu. This was based on the following:.

$$\text{Limit} = \frac{1.09}{Q^{0.26}}$$

Where: Q = 8.0 MMBtu/hr for Boiler #3
Q = 10.0 MMBtu/hr for CDC boiler

D.5.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventative Maintenance Plan, in accordance with Condition B.13 of this permit, is required for the three (3) natural gas fired boilers (ID#'s 2, 3 and CDC).

SECTION D.6 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)

Insignificant Activities:

(aa) Continuous Draw Cell (CDC) Line, which includes a precoat operation, a draw bench operation, an initial alkaline cleaning operation, a straightening operation, a sawing operation, chamfering operation, an intermediate alkaline cleaning operation, an oxidizing operation, and a final alkaline cleaning operation.

(1) The precoat operation utilizes a calcium hydroxide (lime) aqueous solution, which does not contain any VOC or HAP, to protect the steel bars during the drawing operation.

(2) The draw bench operation uses small amount of oil, a nonvolatile material, to protect the drawing dies from scratching.

(3) The three (3) alkaline operations utilize HAP-free aqueous solutions containing 1% by weight of VOC.

(4) The sawing operation is attached to a baghouse (ID# CDC-BH) that has a design maximum outlet grain loading of 0.0004 gr/dscf and a gas flow rate of 2,942 actual cubic feet of air per minute.

(5) The oxidizing operation uses nitric acid solution to oxidize the surface of stainless steel bars. It is designed with water curtains as an integral part of the process to recover and neutralize nitric acid fumes and to prevent cross contamination with the intermediate and final alkaline cleaning operations.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

D 6.1 Particulate Matter

Pursuant to 326 IAC 6-3-2 (Particulate emission limitations for process operations), the particulate matter (PM) emissions from the sawing operation shall not exceed 4.94 pounds per hour.

This limit is determined by the following equation: $E = 4.1 \times (P ^ {0.67})$

Where: P = process weight in tons/hr
= 1.32 TPH

Compliance Determination Requirements

D.6.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

(a) A Preventative Maintenance Plan, in accordance with Condition B.13 of this permit, is required for the sawing operation.

(b) The baghouse for PM control shall be in operation and control the PM emissions from the CDC sawing operation at all times that the sawing operation is in operation.

D.6.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.4.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.6.4 Particulate Matter (PM)

Pursuant to CP005-10284-00040, the dust collector for PM control shall be in operation at all times when the shot blast unit is in operation.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.6.5 Baghouse Inspections [326 IAC 2-7-21(1)(G)(xxix)(FF)

An inspection shall be performed each calendar quarter of all bags controlling the sawing operation when venting directly to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents directly to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.6.6 Visible Emissions Notations

(a) Visible emissions notations of the sawing operation stack shall be performed once per shift when the process is in operation during normal daylight operations when exhausting directly to the atmosphere. A trained employee will record whether emissions are normal or abnormal.

(b) For processes operated continuously “normal” means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C.16 - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.6.7 Record Keeping Requirement

To document compliance with Conditions D.6.1, the Permittee shall maintain records in accordance with (a) through (d) below. Records maintained for (a) through (d) shall be taken daily, unless otherwise specified below, and shall be complete and sufficient to establish compliance with the PM emissions limits established in Condition D.6.1.

(a) visible emissions observations shall be taken once per shift; and

(b) Once per calendar quarter external baghouse unit, ductwork and associated components visible emissions observations;

(c) checklist with dates and initials for each Preventative Maintenance Plan action performed

Records of corrective actions shall be kept on a form approved by IDEM and shall be kept for at least 5 years and made available upon IDEM's request.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: Slater Steels - Fort Wayne Specialty Alloys Division
Source Address: 2400 Taylor Street West, Fort Wayne, Indiana 46802
FESOP No. F003-14978-00011
Facility: Cold Finishing
Parameter: Passivation Rate
Limit: 35,000 tons of steel per 12 consecutive month period rolled on a monthly basis

Year: _____

Month	Monthly metal production rate (tons) A	Metal production rate for the previous 11 months (tons) B	Total metal production rate for the 12 month period (tons) C = A + B
1			
2			
3			

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: Slater Steels - Fort Wayne Specialty Alloys Division
Source Address: 2400 Taylor Street West, Fort Wayne, Indiana 46802
FESOP No.: F003-14978- 00011
Parameter: Annual Natural Gas Usage
Limit: 1,500 million cubic feet (MMcf) per 12 consecutive month period rolled on a monthly basis

Year: _____

Month	Monthly natural gas usage (MMcf) A	Natural gas usage for the previous 11 months (MMcf) B	Total natural gas usage for the 12 month period (MMcf) C = A + B
1			
2			
3			

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Slater Steels
Source Address: 2400 Taylor Street West, Fort Wayne, IN 46802
Mailing Address: P. O. Box 630, Fort Wayne, IN 46801
FESOP No.:

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 **Annual Compliance Certification Letter**

9 **Test Result (specify)** _____

9 **Report (specify)** _____

9 **Notification (specify)** _____

9 **Affidavit (specify)** _____

9 **Other (specify)** _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT

Source Name: Slater Steels
Source Address: 2400 Taylor Street West, Fort Wayne, IN 46802
Mailing Address: P.O. Box 630, Fort Wayne, IN 46801
FESOP No.: 003-14978-00011
This form consists of 2 pages **Page 1 of 2**

This is an emergency as defined in 326 IAC 2-7-1(12)
The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N **Describe:** **Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:**
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Slater Steels
Source Address: 2400 Taylor Street West, Fort Wayne, IN 46802
Mailing Address: P.O. Box 630, Fort Wayne, IN 46801
FESOP No.: 003-14978-00011

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked No deviations occurred this reporting period.
NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.
THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD
Permit Requirement (specify permit condition #)
Date of Deviation: **Duration of Deviation:**
Number of Deviations:
Probable Cause of Deviation:
Response Steps Taken:
Permit Requirement (specify permit condition #)
Date of Deviation: **Duration of Deviation:**

Number of Deviations:
Probable Cause of Deviation:
Response Steps Taken:

Form Completed By: _____

Title/Position: _____

Date: _____ **Phone:** _____

_____**Attach a signed certification to complete this report.**

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the
Technical Support Document (TSD) for a Federally Enforceable Operating Permit (FESOP) Renewal

Source Background and Description

Source Name:	Slater Steels - Fort Wayne Specialty Alloys Division
Source Location:	2400 Taylor Street West, Fort Wayne, Indiana 46802
County:	Allen
SIC Code:	3312
Operation Permit No.:	F003-14978-00011
Permit Reviewer:	Walter Habeeb

On May 10, 2002, the Office of Air Quality (OAQ) had a notice published in the Fort Wayne Journal Gazette News Sentinel, 600 West Main Street, Fort Wayne, IN 46802, stating that Slater Steels Fort Wayne Specialty Alloys Division has applied for a Federally Enforceable State Operating Permit (FESOP) Renewal to operate a stainless steel products processing plant with control. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty(30) days to provide public comments on whether or not this permit should be issued as proposed.

On June 17, 2002, Slater Steels submitted comments on the draft of this FESOP Renewal. The summary of the comments and corresponding responses follows.

Comment 1: Request that the installation of pressure monitors for D.2.6 - CMI Grinder and Billet Shot Blast, D.3.5(a) - CBM Cut-Off Saw, and D.6.5.- CDC Sawing Operation be eliminated.

Response 1: Pressure monitoring for Sections D.2.6 and D.3.5 is necessary to ensure compliance with 326 IAC 6-3 and 326 IAC 2-7 and will remain. However, D.6.5 - CDC Sawing Operation is an Insignificant Activity therefore the pressure monitoring requirement for the CDC Sawing Operation will be eliminated.

~~D.6.5 Monitoring~~

~~(a) The Permittee shall record the total static pressure drop across the baghouse (ID# CDC-BH) controlling the sawing operation at least once per shift when the process is in operation during normal daylight operations. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the dust collector house shall be maintained within the range of 3.0 to 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C.16 - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.~~

~~(b) The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instruments Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months~~.

Due to this deletion, subsequent permit conditions in D.6 have been re-numbered.

Comment 2: Slater Steel request that they be allowed 45 days to make modifications to equipment, Preventative Maintenance Plans and equipment installations to install static pressure monitors for Sections D.2 and D.3.

Response 2: Language has been added to Sections D.2.2(b) and D.3.2(c) of the permit as follows:

The Permittee shall have 30 days from the issuance of this permit to implement a Preventative Maintenance Plan, make modifications to equipment and install pressure monitoring equipment required in D Sections of this permit.

This "Bolded" provision (to allow time to install equipment, etc.) has been added because the original permit did not have pressure monitoring requirements for Sections D.2 and D.3.

Comment 3 : For language consistency throughout Section D, Slater Steels request the words "when the process is in operation" and or "directly" and or "during normal daylight operations" be added to Sections D.1.5(a), D.2.4, D.2.5(a), D.2.6, D.3.3, D.3.4(a), D.3.5(a), D.4.6, D.4.7(a), D.4.8(a), D.6.3, D.6.4(a) and D.6.5(a).

Response 3: For language consistency and to clarify when visual emissions are necessary, the changes requested in Comment 2 have been added to the sections indicated in Comment 2.

Comment 4: For language consistency throughout Section D, Slater Steels request Section D.3.5 and D.4.8 be changed to read "A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C.16 - Compliance Response Plan - shall be considered a violation of this permit.

Response 4: For consistency and clarification the changes requested in Comment 3 for Sections D.3.5 and D.4.8 have been made to the permit.

D.1.5 Visible Emissions Notations

(a) Visible emissions notations of exhaust vent E4 for the ingot grinding operation shall be performed once per shift **when the process is in operation** during normal daylight operations when exhausting **directly** to the atmosphere. A trained employee will record whether emissions are normal or abnormal.

D.2.4 Baghouse Inspections [326 IAC 2-7-21(1)(G)(xxix)(FF)

An inspection shall be performed each calendar quarter of all bags controlling the CMI grinder and billet shot blasting operations when venting **directly** to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents **directly** to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.2.5 Visible Emissions Notations

(a) Visible emissions notations of CMI grinder exhaust (ID# E8a) and the billet conditioning stack (E 9) shall be performed once per shift **when the process is in operation** during normal daylight operations when exhausting **directly** to the atmosphere. A trained employee will record whether emissions are normal or abnormal.

D.2.6 Monitoring

The Permittee shall record the total static pressure drop across the bag houses controlling the CMI grinding and billet shot blasting operations at least once per shift when the process is in operation **during normal daylight operations** when venting **directly** to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of **1.0 and 4.0** inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan -Failure to Take Response.

D.3.3 Baghouse Inspections [326 IAC 2-7-21(1)(G)(xxix)(FF)

An inspection shall be performed each calender quarter of all bags controlling the CBM cut of saw operation when venting **directly** to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents **directly** to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.3.4 Visible Emissions Notations

(a) Visible emissions notations of the CBM cut-off saw stack (E- 10) shall be performed once per shift **when the process is in operation** during normal daylight operations when exhausting **directly** to the atmosphere. A trained employee will record whether emissions are normal or abnormal.

D.3.4 Visible Emissions Notations

(a) Visible emissions notations of the CBM cut-off saw stack (E- 10) shall be performed once per shift **when the process is in operation** during normal daylight operations when exhausting **directly** to the atmosphere. A trained employee will record whether emissions are normal or abnormal.

D.3.5 Monitoring

(a) The Permittee shall record the total static pressure drop across the baghouses controlling the CBM cut-off saw at least once per shift when the process is in operation **during normal daylight operations when venting directly to the atmosphere**. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the dust collector house shall be maintained within the range of 3.0 to 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading. **A pressure reading that is outside the above mentioned range is not a deviation from this permit**. Failure to take response steps in accordance with Section C.16 - Compliance ~~Monitoring~~ **Response** Plan -~~Failure to Take Response Steps~~, shall be considered a violation of this permit.

D.4.6 Baghouse Inspections [326 IAC 2-7-21(1)(G)(xxix)(FF)

An inspection shall be performed each calendar quarter of all bags controlling the Old Bar Shot Blast and the #1 Shot Blast operations when venting **directly** to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents **directly** to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.4.7 Visible Emissions Notations

(a) Visible emissions notations of the baghouses (ID #E15 & #E16)) shall be performed once per shift **when the process is in operation** during normal daylight operations when exhausting **directly** to the atmosphere. A trained employee will record whether emissions are normal or abnormal.

D.4.8 Monitoring

*(*a) The Permittee shall record the total static pressure drop across the baghouses (ID #E15 & E16) controlling the old bar shot and the #1 shot blasting operation at least once per shift when the systems are in operation **during normal daylight operations when venting directly to the atmosphere**. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the dust collector house shall be maintained within the range of 3.0 to 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading. **A pressure reading that is outside the above mentioned range is not a deviation from this permit**. Failure to take response steps in accordance with Section C.16 - **Compliance** ~~Monitoring~~ **Response** Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.6.3 Baghouse Inspections [326 IAC 2-7-21(1)(G)(xxix)(FF)

An inspection shall be performed each calendar quarter of all bags controlling the sawing operation when venting **directly** to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents **directly** to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.6.4 Visible Emissions Notations

(a) Visible emissions notations of the sawing operation stack shall be performed once per shift **when the process is in operation** during normal daylight operations when exhausting **directly** to the atmosphere. A trained employee will record whether emissions are normal or abnormal.

Comment 5: In Section D.2.6 - because page 3 of the Wheelabrator-Frye baghouse manual states " the baghouse should operate when the manometer shows 1.5" to 2" difference in level of the liquid columns". Slater Steels request the pressure drop across the baghouse be changed to read "the normal range of of 1.0 and 4.0 inches of water".

Response 5: Section D.2.6 has been changed to read "1.0 and 4.0 inches of water".

Comment 6: Slater Steels request that the word "below" be changed to " herein" in Sections D.1.7, D.2.7, D.3.6, and D.4.10.

Response 6: The words "below" and "herein" mean the same in the context where they are used in these Sections. Therefore, the word "below" will remain.

For language consistency throughout the permit the following deletion and or additions have been made to the permit:

D.1.6 Monitoring

~~(a) Daily inspections shall be performed to verify the placement, integrity, and particle loading of the filters.~~

~~(b) Additional inspections and preventative measures shall be performed as prescribed in the Preventative Maintenance Plan~~.

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the grinding dust from the dust collection house vent (E4) while the grinders are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the grinding dust emissions from the stack and the presence of grinding dust on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in grinding dust emission, or evidence of grinding dust emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

D.2.7 Broken or Failed Bag Detection
In the event that bag failure has been observed:

(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

D.2.~~7~~ **8** Record Keeping Requirements
(a) Pressure drop (inlet/outlet differential static pressure) across each baghouse **shall be taken once be shift;**
(c) ~~Weekly~~ **once per shift**

D.3.2 Preventative Maintenance Plan
(b) The baghouse for PM control shall be in operation and control the PM emissions from the CBM cutoff saw operation at all times that the CBM cutoff saw is in operation.

D.3.6 Broken or Failed Bag Detection
In the event that bag failure has been observed:

(a) For multi-compartment units, the affected compartments will be shut down

immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

D.3.6~~6~~ **7** Record Keeping

D.4.5 Preventative Maintenance Plan

(b) The baghouse for PM control shall be in operation and control the PM emissions from the CBM cutoff saw operation at all times that the CBM cutoff saw is in operation.

D.4.9 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Due to this addition, subsequent permit conditions in D.4 have been re-numbered.

To comply with 326 IAC 6-2-3 and 6-2-4, Section D.5.1(Particulate Matter) has been changed to read as follows:

D.5.1 Particulate Matter

(a) Pursuant to 326 IAC 6-2-3 (Particulate Emission Limitations for Indirect Heating Facilities), the particulate matter (PM) emissions from boiler # 2 shall not exceed 0.8 pounds per million Btu. This was based on the following:

Limit = PM(TPY) x 2000(lb/ton) / 8760(hr/yr) x Boiler Capacity(MMBtu/hr)
Where: PM = 0.60 TPY; Boiler Cap. = 3.35 MMBtu/hr

(b) Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Indirect Heating Facilities), the particulate matter (PM) emissions from # 3 and CDC boilers shall not exceed 0.6 pounds per million Btu. This was based on the following:.

$$\text{Limit} = \frac{1.09}{Q^{0.26}}$$

Where: Q = 8.0 MMBtu/hr for Boiler #3
Q = 10.0 MMBtu/hr for CDC boiler

To be comply with 326 IAC 6-3-2 (Particulate Matter), Section D.6.1 has been changed to read as follows:

D 6.1 Particulate Matter

Pursuant to 326 IAC 6-3-2 (Particulate emission limitations for process operations), the particulate matter (PM) emissions from the sawing operation shall not exceed 4.94 pounds per hour.

This limit is determined by the following equation: E = 4.1 x (P ^ 0.67)
Where: P = process weight in tons/hr
= 1.32 TPH

The following Sections have been add to D.6.

D.6.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.4.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.6.4 Particulate Matter (PM)

Pursuant to CP005-10284-00040, the dust collector for PM control shall be in operation at all times when the shot blast unit is in operation.

D.6.~~3~~ **5**
D.6.~~4~~ **6**
D.6.~~5~~ **7** (Record Keeping Requirements) Shall be changed to read as follows:

~~Records shall be kept of every "abnormal"condition and corrective action taken. Records of corrective actions shall be kept on a form approved by IDEM and shall be kept for a least 5 years and made available upon IDEM's request~~.

To document compliance with Conditions D.6.1, the Permittee shall maintain records in accordance with (a) through (d) below. Records maintained for (a) through (d) shall be taken daily, unless otherwise specified below, and shall be complete and sufficient to establish compliance with the PM emissions limits established in Condition D.6.1.

(a) visible emissions observations shall be taken once per shift; and

(b) Once per calendar quarter external baghouse unit, ductwork and associated components visible emissions observations;

(c) checklist with dates and initials for each Preventative Maintenance Plan action performed.

Records of corrective actions shall be kept on a form approved by IDEM and shall be kept for at least 5 years and made available upon IDEM's request.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Federally Enforceable Operating Permit (FESOP) Renewal

Source Background and Description

Source Name:	Slater Steels - Fort Wayne Specialty Alloys Division
Source Location:	2400 Taylor Street West, Fort Wayne, Indiana 46802
County:	Allen
SIC Code:	3312
Operation Permit No.:	F003-14978-00011
Permit Reviewer:	Walter Habeeb

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from Slater Steels - Fort Wayne Specialty Alloys Division relating to the operation of a stainless steel products processing plant. Slater Steels was issued FESOP 003-5725-00011 on June 25, 1997.

Source Definition

The source previously consisted of a stainless steel melting, rolling and finishing manufacturing plant. The entire melting operation has been eliminated. The plant is now a stainless steel rolling and finishing operation.

History

On June 25, 1997, IDEM issued a FESOP (F-003-5725-00011) to Slater Steels and a FESOP (F003-5629-00011) to International Mill Service, Incorporated a supporting operation at the same location and owned by Slater Steels. The International Mill Service, Incorporated operation was eliminated with the elimination of the melting operation, therefore they will not seek a renewal of their FESOP (F003-5629-00011).

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) Primary Mill

(1) one (1) ingot grinding operation (ID# B1). This operation has a maximum capacity of 10.27 tons per hour, is equipped with a dust collection house ID# E4, and exhausts through vent E4;

(2) eight (8) natural gas-fired preheat charge furnaces (ID#s B2a through B2h). The total maximum preheat capacity through all 8 furnaces is 10.27 tons per hour. Each furnace has a maximum heat input capacity of 31.6 million Btu per hour. The furnaces are not equipped with an air pollution control device and exhaust into the building;

(3) four (4) natural gas-fired annealing furnaces (ID#s B4a through B4d). The total maximum annealing capacity through all 4 furnaces is 10.27 tons per hour. Each furnace has a maximum heat input capacity of 13.0 million Btu per hour. The furnaces are not equipped with an air pollution control device and exhaust into the building.

(b) Billet Conditioning

(1) one (1) dry grinding operation (ID# C3). This operation has one grinding station and has a total maximum capacity of 1.6 tons per hour. This operation is not equipped with any air pollution control device, and exhausts through vents E6;

(2) one (1) CMI grinder (ID# C5). This grinder has a maximum capacity of 1.6 tons per hour, is equipped with a baghouse (ID# E8a), and exhausts into the building; and

(3) one (1) billet shot blasting operation (ID# C4). This operation has a maximum processing capacity of 4.0 tons of billets per hour, is equipped with a baghouse (ID# E9), and exhausts through stack E9.

(c) Continuous Bar Mill

(1) one (1) CBM cut-off saw (ID# D2). This saw has a maximum processing capacity of 5.14 tons of bars per hour, is equipped with a baghouse (ID# E10), and exhausts through stack E10; and

(2) one (1) natural gas-fired annealing furnace (ID# D3). This furnace has a maximum heat input capacity of 13.9 million Btu per hour, is not equipped with any air pollution control device, and exhausts into the building.

(d) Cold Finishing

(1) one (1) passivation system (ID# E3). This system has a maximum capacity of 4.0 tons of stainless steel bars per hour, is equipped with a mist eliminator (ID# E12), and exhausts through stack E12;

(2) one (1) old bar shot blasting operation (ID# E6). This operation has two blasting stations with a total maximum capacity of 1.83 tons of stainless steel bar per hour, is equipped with a baghouse (ID# E15), and exhausts inside the building; and

(3) one (1) #1 shot blasting operation (ID# E7). This operation has a maximum capacity of 1.83 tons of stainless steel bar per hour, is equipped with a baghouse (ID# E16), and exhausts inside the building.

There are no new units operating at this source during this review process.

Insignificant Activities

A.1 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]
This stationary plant also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) three (3) natural gas-fired boilers (ID#s 2, 3, and CDC boiler), with maximum heat input capacities less than or equal to 10.0 million Btu per hour;

(b) natural gas-fired heat treat furnaces with heat input capacities less than or equal to 10 million Btu per hour;

(c) combustion source flame safety purging start up;

(d) a gasoline transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons;

(e) a petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month;

(f) vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;

(g) refractory storage not requiring air pollution control equipment;

(h) application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings;

(i) machining where an aqueous cutting coolant continuously floods the machining interface;

(j) cleaners and solvents characterized as follows:

(1) having a vapor pressure equal to or less than 2 kilopascals; 15 mm Hg; or 0.3 psi measured at 38 C (I00 F); or

(2) having a vapor pressure equal to or less than 0.7 kilopascal; 5 mm Hg; or 0.1 psi measured at 20 C (68 F);

the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months;

(k) closed loop heating and cooling systems;

(l) forced and induced draft noncontact cooling tower system not regulated under a NESHAP;

(m) quenching operations used with heat treating processes;

(n) replacement or repair of electrostatic precipitators, bags in baghouses, and filters in other air filtration equipment;

(o) heat exchanger cleaning and repair;

(p) process vessel degassing and cleaning to prepare for internal repairs;

(q) paved roads and parking lots with public access;

(r) equipment used to collect any material that might be released during a malfunction, process upset, or spill clean up, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment;

(s) blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling tower;

(t) furnaces used for melting metal other than beryllium with a brim full capacity of less than or equal to 450 cubic inches by volume;

(u) a laboratory as defined in 326 IAC 2-7-1;

(v) safety clean parts washers for maintenance work;

(w) electro slag remelt operation;

(x) noncontact cooling towers used with chiller systems (no chromates);

(y) grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations;

(z) any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs; and

(aa) the Continuous Draw Cell (CDC) Line, which includes a precoat operation, a draw bench operation, an initial alkaline cleaning operation, a straightening operation, a sawing operation, chamfering operation, an intermediate alkaline cleaning operation, an oxidizing operation, and a final alkaline cleaning operation.

(1) The precoat operation utilizes a calcium hydroxide (lime) aqueous solution, which does not contain any VOC or HAP, to protect the steel bars during the drawing operation.

(2) The draw bench operation uses small amount of oil, a nonvolatile material, to protect the drawing dies from scratching.

(3) The three (3) alkaline operations utilize HAP-free aqueous solutions containing 1% by weight of VOC.

(4) The sawing operation is attached to a baghouse (ID# CDC-BH) that has a design maximum outlet grain loading of 0.0004 gr/dscf and a gas flow rate of 2,942 actual cubic feet of air per minute.

(5) The oxidizing operation uses nitric acid solution to oxidize the surface of stainless steel bars. It is designed with water curtains as an integral part of the process to recover and neutralize nitric acid fumes and to prevent cross contamination with the intermediate and final alkaline cleaning operations.

Existing Approvals

On June 25 ,1997 Slater Steels was issued a FESOP (F003-5725-00011) and on September 17, 2001 Slater Steels was issued a Significant Permit Modification (SMF 003-9460-00011).

All conditions from previous approvals were incorporated into this FESOP except the following:

Due to the elimination of the melting operation the following emission units, pollution control devices and its corresponding FESOP conditions were eliminated:

(a) Melt Shop

(1) two (2) electric arc furnaces (ID# A1a and A1b), with A1b serving as a back-up. Each furnace has a maximum melting capacity of 10 tons per hour, equipped with a baghouse (ID# E1), and exhaust through stack E1;

(2) one (1) argon-oxygen decarburization furnace (ID# A2). This furnace has a maximum metal refining capacity of 10 tons per hour, is equipped with a baghouse (ID# E2), and exhausts through stack E2. This furnace has the capability of switching over to baghouse E1; and

(3) one (1) ingot molding operation (ID# A3). This operation has a maximum capacity of 10 tons per hour, is equipped with a baghouse (ID# E3), and exhausts through the building evacuation stack E3. During a 3/3 power curtailment, this operation exhausts through baghouse E2.

(b) Primary Mill

one (1) primary mill cobble burn operation (ID# B5). This operation has a maximum operation capacity of 0.8 tons per hour, is equipped with a baghouse (ID# E5), and exhausts through stack E5.

(c) Hilti Station

one (1) Hilti mold cleaning operation (ID# A4). This operation has a maximum capacity of 3.5 tons per hour, sis equipped with a baghouse (ID# E14), and exhausts through stack E14.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the FESOP renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP renewal application for the purposes of this review was received on September 28, 2001. Additional information was received on November 19, 2001.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (pages 1 -13).

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source. PTE is defined as " the maximum capacity of a stationary source to emit a pollutant under its physical and operational design.

Pollutant	Unrestricted Potential Emissions (tons/yr)
PM	95.24
PM-10	97.04

SO_2	0.23
VOC	4.11
CO	35.56
NO_x	114.07

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Unrestricted Potential Emissions (tons/yr)
Chromium	6.51
Manganese	2.61
Nickel	1.96
Lead	0.38
TOTAL	11.46

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of NOx and PM_{10} is equal to or greater 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7-1.

(b) Since this type of operation is one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are counted toward determination of PSD and Emission Offset applicability.

Potential to Emit After Issuance

The source, issued a FESOP on June 25, 1997, has opted to remain a FESOP source, rather than apply for a Part 70 Operating Permit. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of this Federally Enforceable State Operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit. Since the source has not constructed any new emission units, the source's potential to emit is based on the emission units included in the original FESOP (F003-5725-00011; issued on June 25**,** 1997) less emissions from the equipment that has been eliminated and on the following conditions. The source has accepted the following federally enforceable limits:

(a) Passivation production shall be limited to 35,000 tons per 12 consecutive month period rolled on a monthly basis.

(b) The annual natural gas usage shall not exceed 1.5 billion cubic feet per 12 consecutive month period rolled on a monthly basis.

	Potential to Emit After Issuance (tons/year)						
Process/emission unit	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
Ingot Grinding (B1)	11.14	11.14	-	-	-	-	2.13
Eight Charge Furnaces (B2a - B2h), Four Anneal Furnaces (B4a - B4d) CBM Anneal Fce. (D3)	5.23	5.23	0.03	2.31	9.16	43.6	-
Billet Grinding (C3)	5.75	5.75	-	-	-	-	0.85
CMI Grinder (C5)	0.04	0.04	-	-	-	-	-
Billet Shot Blast (C4)	0.10	0.10	-	-	-	-	0.02
CBM Cut-off Saw (D2)	0.05	0.05	-	-	-	-	0.29
Passivation System (E3)	7.88	7.88	-	-	-	21.49	3.34
Old Bar Shot (E6)	0.09	0.09	-	-	-	-	0.01
#1 Bar Shot Blast (E7)	0.09	0.09	-	-	-	-	-
Insignificant Activity Building Heat & Additional Equipment	0.6	2.4	0.2	1.8	26.4	31.4	0.59
Total PTE after Issuance	30.97	32.77	0.23	4.11	35.56	96.49	7.23

County Attainment Status

The source is located in Allen County.

Pollutant	Status
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Allen County has been designated as attainment or unclassifiable for ozone.

(b) Allen County has been classified as attainment or unclassified for all criteria pollutant. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Federal Rule Applicability

As a result of rule changes the following rules apply:

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

The following are state rules that apply to facilities at Slater Steels:

[326 IAC 4-1] [IC 13-17-9](Open Burning)

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6.The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

326 IAC 6-4(Fugitive Dust Emissions)

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

326 IAC 2-2 (PSD Requirements)

This source is subject to 326 IAC 2-2 PSD Requirements), because it has the potential to emit more than one hundred (100) tons per year of PM_{10}.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year) of NOx. Pursuant to this rule, the owner/operator of the source must submit an emission statement for the source. The statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6 and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8).

326 IAC 2-7-2 (Part 70 Permits Applicability)

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because it is a major source, as defined in 326 IAC 2-7-1 (22).

326 IAC 2-8-2 (FESOP Applicability)

This source required to have a Part 70 permit may apply to the commissioner for a FESOP. Until the commissioner has issued the FESOP for the source, the source is subject to all applicable requirements of 326 IAC 2-7.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 6-2-3 (Particulate Emissions Limitations for Indirect Heating Facilities)

This rules requires that particulate matter (PM) emissions from each of the two (2) natural gas boilers (D# 2 and #3), which were built prior to September 21, 1983, to not exceed 2.14 pounds per million Btu. The following calculation determines compliance with 326 IAC 6-2-3 for indirect heating facilities (i.e. boilers) built prior to September 21, 1983.

$$\text{Limit} = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}} = 6.4 \text{ lb/ MMBtu}$$

Where C = 50 micrograms/cu. Meter, maximum ground level concentration
Q = 3.35 MMBtu/hr, heat input rate
N = 1 number of stacks
a = 0.67 dimensionsless, plume rise factor
h = 36 ft, average stack height

326 IAC 6-3-2 (Process Operations)

This rule requires that the particulate matter (PM) from the facilities listed below shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

The control equipment, for the operations that require it, shall be in operation at all times the facility is in operation in order to comply with this limit.

Operation	326 IAC 6-3-2 Limit (lbs/hr)
Ingot Grinding (B1)	19.53
8 Charge Furnaces (B2a - B4h), 4 Annealing Furnaces (B4a - B4d), CBM Anneal Fce.(D3)	19.53
Billet Grinding (C3)	4.80
CMI Grinder (C5)	4.18
Billet Shot Blasting (C4)	10.38
CMB Cut-off Saw (D2)	12.21
Passivation System (E3)	10.38
Old Bar Shot (E6)	6.15
#1 Shot Blasting (E7)	6.15

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

All compliance requirements from previous approvals were incorporated into this FESOP except for compliance requirements for equipment that has been eliminated. The compliance monitoring requirements applicable to this source are as follows:

(1) The primary mill, billet conditioning shop, and continuous bar mill operations have applicable compliance monitoring conditions as specified below:

(a) Visible emissions observations of the primary mill stacks and vents shall be performed once per shift. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

(b) The Permittee shall record the total static pressure drop across the baghouses controlling the primary mill, billet conditioning shop and continuous bar mill, at least once per shift when the systems are in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 3.0 to 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

These monitoring conditions are necessary because the baghouses and dust collection house for the process systems must operate properly to ensure compliance with 326 IAC 6-3 (Process operations) and 326 IAC 2-7 (Part 70).

An inspection shall be performed each calender quarter of all bags controlling the primary mill, billet conditioning shop and continuous bar mill operations when venting to the atmosphere. A baghouse inspection shall be performed within three months of

redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

(c) Stack Testing is required under the following criteria: For the "major" pollutant (NOx in the case of this facility) a single facility or control devise which hasn't been tested in the past 5 years and accounts for more than 40% of the PTE before controls should be tested. The largest source of NOx at this facility, the charging and annealing furnaces, emit less than 40% of the total source NOx therefore stacking testing shall not be required. However, this does not preclude testing requirements on these facilities under 326 IAC 2-1-1-5(b) ans 326 IAC 2-8-4.

(d) In the event that bag failure has been observed:
For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(e) Dust Collector Operational Parameters
The following records shall be maintained to demonstrate on-going compliance with 326 IAC 6-3-2 (Particulate Emissions Limitations for Process Operations):

(i) Pressure drop (inlet/outlet differential static pressure) across each baghouse;

(ii) visible emissions observations shall be taken (once per shift); and

(iii) Weekly external baghouse unit, ductwork and associated components visible emissions observations;

(iv) checklist with dates and initials for each Preventative Maintenance Plan action performed

Records of corrective actions shall be kept on a form approved by IDEM and shall be kept for at least 5 years and made available upon IDEM's request.

(g) Quarterly Reporting
That the Permittee shall submit quarterly reports within thirty (30) days after the end of the quarter being reported. These reports shall include the time and duration of all instances of readings that were outside of the indicated performance criteria ranges and a certification that appropriate corrective actions were promptly taken or a certification that all readings were within the indicated ranges.

(h) Quality Control
(i) That all instruments and equipment shall be calibrated, maintained, and operated

according to the manufacture's specification.

(ii) That an Operation and Preventive Maintenance Plan implementation shall be available to the IDEM upon request and shall include:

(aa) inspection checklists

(bb) operator standard operating procedures

(cc) spare parts inventory

(iii) That an equipment Corrective Action Contingency Plan shall be drafted in anticipation of control equipment malfunctions and shall be implemented on an as needed basis.

(2) The cold finishing shop operations have applicable compliance monitoring conditions as specified below:

(a) Visible emissions observations of the primary mill stacks and vents shall be performed once per shift. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C.16 - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(b) The Permittee shall record the total static pressure drop across the baghouses and dust collection house controlling the cold finishing shop operations, at least once per shift when the systems are in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 3.0 to 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

These monitoring conditions are necessary because the baghouses and dust collection house for the process systems must operate properly to ensure compliance with 326 IAC 6-3 (Process operations) and 326 IAC 2-7 (Part 70).

An inspection shall be performed each calender quarter of all bags controlling the primary mill, billet conditioning shop and continuous bar mill operations when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

(c) Stack Testing is required under the following criteria: For the "major" pollutant (NOx in the case of this facility) a single facility or control devise which hasn't been tested in the past 5 years and accounts for more than 40% of the PTE before controls should be tested. The largest source of NOx at this facility, the charging and annealing furnaces, emit less than 40% of the total source NOx therefore stacking testing shall not be

required. However, this does not preclude testing requirements on these facilities under 326 IAC 2-1-1-5(b) ans 326 IAC 2-8-4.

(d) In the event that bag failure has been observed:
For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(e) Daily Visual Monitoring of Amount of Chemical NOx Suppression Blanket and Monitoring of Surface Tension of Acid Bath
The chemical suppression blanket for NOx shall be added to each passivatrion bath at all times when the passivation system is in operation. The Permittee shall visually monitor the amount of chemical NOx suppression blanket present in each passivation bath noting whether or not a chemical foam sufficiently covers the passivation bath. The Permittee shall also daily maintain the surface tension of the passivation bath within the optimum baseline range. This is to determine on-going compliance with 326 IAC 2-8(FESOP Rules), in the absence of any NOx compliance test.

(f) Control Equipment Operational Parameters
The following records shall be maintained to demonstrate on-going compliance with 326 IAC 6-3-2 (Particulate Emissions Limitations for Process Operations):

(i) Pressure drop (inlet/outlet differential static pressure) across each baghouse;

(ii) visible emissions observations shall be taken once per shift on baghouse and mist eliminator stacks; and

(iii) weekly external baghouse unit, ductwork and associated components visible emissions observations;

(iv) checklist with dates and initials for each Preventative Maintenance Plan action performed

Records of corrective actions shall be kept on a form approved by IDEM and shall be kept for at least 5 years and made available upon IDEM's request.

(g) Amount of Chemical NOx Suppression Blanket and Surface Tension of Each Passivation Bath
That the Permittee shall maintain daily records of the following parameters to determine on-going compliance with operation condition 326 IAC 2-8 (FESOP Rules):

(i) Visual observations on the amount of chemical Nox suppressant present in each

passivation bath; and

(ii) surface tension of each passivation bath

Records of corrective actions shall be kept on a form approved by IDEM and shall be kept for at least 5 years and made available upon IDEM's request.

(h) Quarterly Reporting
That the Permittee shall submit quarterly reports within thirty (30) days after the end of the quarter being reported. These reports shall include the time and duration of all instances of readings that were outside of the indicated performance criteria ranges and a certification that appropriate corrective actions were promptly taken or a certification that all readings were within the indicated ranges.

(i) Quality Control
(i) That all instruments and equipment shall be calibrated, maintained, and operated according to the manufacture's specification.

(ii) That an Operation and Preventive Maintenance Plan implementation shall be available to the IDEM upon request and shall include:

(aa) inspection checklists

(bb) operator standard operating procedures

(cc) spare parts inventory

(iii) That an equipment Corrective Action Contingency Plan shall be drafted in anticipation of control equipment malfunctions and shall be implemented on an as needed basis.

(3) The two (2) natural gas fired boilers (ID#'s 2 and 3) have applicable compliance monitoring conditions as specified below:

(a) Visible emissions observations at the boiler stacks and vents shall be performed once per shift noting whether emissions are" normal" or "abnormal". This shall also help determine on-going compliance with 326 IAC 6-3-2 (Particulate Limitations for Process Operations), in the absence of any compliance test. This does not require the use of a certified emissions reader.

In the event that visible emissions are detected to be "abnormal" or any visible emissions are detected on the external baghouse components, the Corrective Action Contingency Plan shall be implemented. Corrective action shall be taken within 8 hours of discovery. If the initial corrective action plan does not correct the problem, then additional corrective actions shall be devised within 8 hours of discovery and shall include a timetable for completion. The corrective actions shall be implemented immediately in accordance with those timetables.

(b) That the Permittee shall maintain a log of every "abnormal" condition and corrective actions taken.

(c) There are no reporting requirements necessary for the two boilers.

Conclusion

The operation of this stainless steel rolling and finishing plant shall be subject to the conditions of the attached proposed (FESOP No.: F003-14978-00011).

Company Name: Slater Steels Fort Wayne Specialty Alloys
Plant Location: 2400 Taylor Street West, Fort Wayne, IN 46802
County: Allen
Permit Reviewer: Walter Habeeb
Title V #: F003-14978
Plt. ID #: 003-00011

* * Process Emissions * *

Process:	Rate (MMcf/yr)	Pollutant	Ef (lb/ton produced	Ebc (ton/yr)	Eac (ton/yr)	Type of control	Control Efficiency (%)
8 charge fces	872	PM	12.00	5.23	5.23	none	
(B2a-B2h)		PM-10	12.00	5.23	5.23	none	
4 Anneal fces)B4a-B4d)		SO2	0.06	0.03	0.03	none	
Nat Gas boilers #2 &#3		NOx	100.00	43.60	43.60	none	
1 Anneal fces(D3)		VOC	5.30	2.31	2.31	none	
Slater accepted a source-wide		CO	21.00	9.16	9.16	none	
nat gas usage of 1,500MMcf/yr							
all emissions are combustion							
related							

Allowable Emissions:

The following calculations determine PM compliance with 326 IAC 6-3-2 for process weight rates less than 30 tons per hour:

P= 10.27 tons/hr

limit = 4.1 x (10.27 ^0.67) = 19.5 lb/hr (allowable)

with potential:

5.2 tons/yr x 2000 lb/ton / 8760 hr/yr = 1.2 lb/hr (will comply)

Process:	Rate (tons ingots/hr	Pollutant	Ef (lb/ton produced	Ebc (ton/yr)	Eac (ton/yr)	Type of control	Control Efficiency (%)	
Ingot Grinding	10.274	PM	0.99	44.55	11.14	Dust		75.00%
(B1);ventE-4		PM-10	0.99	44.55	11.14	Collection		75.00%
		SO2	0.00	0.00	0.00	House		
		NOx	0.00	0.00	0.00			
EPA SCC# 3-04-003-03		VOC	0.00	0.00	0.00			
AP-42 Ch. 12.10		CO	0.00	0.00	0.00			
		chromium	0.09	3.96	0.99			75.00%
		manganese	0.05	2.21	0.55			75.00%
		nickel	0.01	0.49	0.49			
		arsenic	0.00	0.00	0.00			
		cadmium	0.00	0.00	0.00			
		selenium	0.00	0.00	0.00			
		Lead	0.00	0.10	0.10			

Allowable Emissions:

The following calculations determine PM compliance with 326 IAC 6-3-2 for process weight rates less than 30 tons per hour:

P= 10.274 tons/hr

limit = 4.1 x (10.274 ^0.67) = 19.5 lb/hr (allowable)

with potential:

11.1 tons/yr x 2000 lb/ton / 8760 hr/yr = 2.5 lb/hr (will comply)

Slater Steels Fort Wayne Specialty Alloys
2400 Taylor Street West, Fort Wayne, IN 46802

Process:	Rate tons billets/hr	Pollutant	Ef (lb/ton produced	Ebc (ton/yr)	Eac (ton/yr)	Type of control	Control Efficiency (%)
Billet	1.6	PM	0.82	5.75	5.75	none	
Grinding (C3)		PM-10	0.82	5.75	5.75	none	
vents E6		SO2	0	0.00	0.00		
no control		NOx	0	0.00	0.00		
EPA SCC# 3-04-003-01		VOC	0	0.00	0.00		
AP-42 Ch. 12.10		CO	0	0.00	0.00		
		chromium	0.073	0.51	0.51	none	
		manganese	0.007	0.05	0.05	none	
		nickel	0.041	0.29	0.29	none	
		arsenic	0	0.00	0.00		
		cadmium	0.00000	0.00	0.00		
		selenium	0	0.00	0.00		
		Lead	0	0.00	0.00		
		phenol	0	0.00	0.00		
		benzene	0	0.00	0.00		
		formaldehyde	0	0.00	0.00		
		xylene	0	0.00	0.00		
		toluene	0	0.00	0.00		

Allowable Emissions:

The following calculations determine PM compliance with 326 IAC 6-3-2 for process weight rates greater than rates less than 30 tons per hour

P= 1.6 tons/hr

limit = 4.1 x (3.995 ^0.67) = 10.4 lb/hr (allowable)

with potential:

5.7 tons/yr x 2000 lb/ton / 8760 hr/yr = 3.3 lb/hr (will comply)

Process:	Rate tons billets/hr	Pollutant	Ef lb/ton billets	Ebc (ton/yr)	Eac (ton/yr)	Type of control	Control Efficiency (%)
CMI Grinder	1.6	PM	0.82	5.75	0.06	baghouse	99.00%
C5		PM-10	0.82	5.75	0.06	baghouse	99.00%
Particulate is		SO2	0.00	0.00	0.00		
controlled by a		NOx	0.00	0.00	0.00		
baghouse &		VOC	0.00	0.00	0.00		
emitted into Bldg		CO	0.00	0.00	0.00		
		chromium	0.07	0.51	0.01	baghouse	99.00%
		manganese	0.01	0.05	0.00	baghouse	99.00%
		nickel	0.04	0.29	0.00	baghouse	99.00%
		arsenic	0.00	0.00	0.00		
		cadmium	0.00	0.00	0.00		
		selenium	0.00	0.00	0.00		
		Lead	0.00	0.00	0.00		

Allowable Emissions:

The following calculations determine PM compliance with 326 IAC 6-3-2 for process weight rates greater than rate less than 30 tons per hour

P= 1.6 tons/hr

limit = 4.1 x (.7 ^ 0.67) = 3.2 lb/hr (allowable)

with potential:

0.1 tons/yr x 2000 lb/ton / 8760 hr/yr = 0.0 lb/hr (will comply)

Process:	Rate tons billets/hr	Pollutant	Ef (lb/ton produced	Ebc (ton/yr)	Eac (ton/yr)	Type of control	Control Efficiency (%)
Billet	4.0	PM	0.59	10.34	0.10	baghouse	99.00%
Shot blasting	C4	PM-10	0.59	10.34	0.10		99.00%
iron grit stack E9		SO2	0.00	0.00	0.00		
controlled by a		NOx	0.00	0.00	0.00		
baghouse		Chrome	0.05	0.88	0.01	baghouse	99.00%
		Nickel	0.03	0.53	0.01	baghouse	99.00%
		Manganese	0.01	0.18	0.00	baghouse	99.00%

Allowable Emissions:

The following calculations determine PM compliance with 326 IAC 6-3-2 for process weight rates less than 30 tons per hour:

P= 4 tons/hr

limit = 4.1 x (4 ^0.67) = 10.4 lb/hr (allowable)

with potential:

0.1 tons/yr x 2000 lb/ton / 8760 hr/yr = 0.0 lb/hr (will comply)

Process:	Rate tons billets/hr	Pollutant	Ef (lb/ton produced	Ebc (ton/yr)	Eac (ton/yr)	Type of control	Control Efficiency (%)
CBM cutoff	5.1	PM	0.21	4.73	0.05	Baghouse	99.00%
saw D2 stack E10		PM-10	0.21	4.73	0.05		99.00%
		SO2	0.00	0.00	0.00		
		NOx	0.00	0.00	0.00		
		VOC	0.00	0.00	0.00		
		CO	---	0.00	0.00		
		chromium	0.02	0.43	0.00	Baghouse	99.00%
		manganese	0.00	0.05	0.00	Baghouse	99.00%
		nickel	0.01	0.23	0.00	Baghouse	99.00%
		arsenic	0.00	0.01	0.01		
		cadmium	0.00	0.00	0.00		
		selenium	0.00	0.00	0.00		
		Lead	0.01	0.28	0.28		

Allowable Emissions:

The following calculations determine PM compliance with 326 IAC 6-3-2 for process weight rates less than 30 tons per hour:

P= 5.14 tons/hr

limit = 4.1 x (5.14 ^0.67) = 12.3 lb/hr (allowable)

with potential:

0.1 tons/yr x 2000 lb/ton / 8760 hr/yr = 0.0 lb/hr (will comply)

Process:	Rate tons bars/hr	Pollutant	Ef lb/ton bars	Ebc (ton/yr)	Eac (ton/yr)	Type of control	Control Efficiency (%)
Passivation E3	4.000	PM	0.45	7.88	7.88		
stack E12		PM-10	0.45	7.88	7.88		
		SO2	0.00	0.00	0.00		
		NOx	2.23	39.07	21.49	foam	45.00%
		VOC	0.00	0.00	0.00		
		CO	0.00	0.00	0.00		
	Hydroflouric	Acid	0.19	3.33	3.33		
		cobalt	0.00	0.00	0.00		
		nickel	0.00	0.00	0.00		
		manganese	0.00	0.01	0.01		
		cadmium	0.00	0.00	0.00		
		selenium	0.00	0.00	0.00		
		Lead	0.00	0.00	0.00		

Allowable Emissions:

The following calculations determine PM compliance with 326 IAC 6-3-2 for process weight rates less than 30 tons per hour:

P= 4 tons/hr

limit = 4.1 x (4 ^0.67) = 10.4 lb/hr (allowable)

with potential:

7.9 tons/yr x 2000 lb/ton / 8760 hr/yr = 1.8 lb/hr (will comply)

Process:	Rate (tons bars/hr	Pollutant	Ef (lb/ton bars)	Ebc (ton/yr)	Eac (ton/yr)	Type of control	Control Efficiency (%)
Old Bar Shot	1.83	PM	0.59	4.73	0.09	baghouse	98.00%
Blast E6		PM-10	0.59	4.73	0.09		98.00%
Particulate control by a		SO2	0.00	0.00	0.00		
baghouse & emitted		NOx	0.00	0.00	0.00		
inside bldg.		Chrome	0.05	0.40	0.01	baghouse	98.00%
		Nickel	0.03	0.24	0.00	baghouse	98.00%
		manganese	0.01	0.08	0.00	baghouse	98.00%

The following calculations determine PM compliance with 326 IAC 6-3-2 for process weight rates less than 30 tons per hour:

P= 1.83 tons/hr

limit = 4.1 x (1.83 ^0.67) = 6.1 lb/hr (allowable)

with potential:

0.1 tons/yr x 2000 lb/ton / 8760 hr/yr = 0.0 lb/hr (will comply)

Process:	Rate (tons iron/hr)	Pollutant	Ef (lb/ton produced	Ebc (ton/yr)	Eac (ton/yr)	Type of control	Control Efficiency (%)
#1 Bar Shot	1.83	PM	0.59	4.73	0.09	baghouse	98.00%
Blast E7		PM-10	0.59	4.73	0.09		98.00%
Particulate controlled by a		SO2	0.00	0.00	0.00		
baghouse & emitted		NOx	0.00	0.00	0.00		
inside Bldg.		Chrome	0.05	0.00	0.00	baghouse	98.00%
		Nickel	0.03	0.00	0.00	baghouse	98.00%
		Manganese	0.01	0.00	0.00	baghouse	98.00%

Allowable Emissions:

The following calculations determine PM compliance with 326 IAC 6-3-2 for process weight rates less than 30 tons per hour:

P= 1.83 tons/hr

limit = 4.1 x (1.83 ^0.67) = 6.1 lb/hr (allowable)

with potential:

0.1 tons/yr x 2000 lb/ton / 8760 hr/yr = 0.0 lb/hr (will comply)

Process:	Rate (tons cut/ hr)	Pollutant	Ef (lb/ton scrap cut	Ebc (ton/yr)	Eac (ton/yr)	Type of control	Control Efficiency (%)
Nat. Gas Fired Boilers		PM	0.00	0.60	0.60		
#2,#3,CDC		PM-10	0.00	0.00	0.00		
all emissions		SO2	0.00	0.00	0.00		
combustion related		NOx	0.00	0.00	0.00		
		Chrome	0.28	0.00	0.00		
		Nickel	0.16	0.00	0.00		
		Manganese	0.03	0.00	0.00		

Allowable Emissions:

The following calculations determine PM compliance with 326 IA ith 326 IAC 6-2-3 indirect heating facilities (boiler #2) built prior to 9/21/83.

limit= (C) (a) (h) / (76.5) (Q^ 0.75) (N^0.25) = 6.37 lb/MMBtu (allowable)

where C= 50 micrograms/cu meter, Q= 3.35MMBtu/hr, N=1-number of stacks, a= 0.67 plume rise factor, h= 36 ft- stack height

(0.60 TPY) (2000lb/ton) / (8760 hr/yr) (3.35 MMBTU) = 0.041 lb /MMBtu (will comply)

The following calculations determine PM compliance with 326 IAC 6-2-3 for indirect heating facilities (#3 &CDC boilers) built after 9/21/83.

limit= 1.09 /Q^0.26 = 0.63 lb / MMBtu (allowable)
where Q = 8.0 MMBtu/hr (#3) and 9.1 MMBtu/hr (CDC)

(0.60TPY) (2000lb/ton) / (8760hr/yr) (8.0 MMBtu/hr) = 0.017 lb/MMBtu (will comply)

(0.60TPY) (2000lb/ton) / (8760 hr / yr) (10.0 MMBtu/hr) = 0.014 lb / MMBtu (will comply)

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler

Company Name: **Slater Steels**
Address City IN Zip: **Fort Wayne, In**
CP: **F003-14978**
Plt ID: **P003-00011**
Reviewer: Walter Habeeb
Date: Nov. 29, 2001

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr	
14.6	127.9	Building Heat

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.1	0.5	0.0	6.4	0.4	5.4

*PM emission factor is filterable PM only. PM10 emission factor is condensable and filterable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

See page 2 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler
HAPs Emissions

Company Name: **Slater Steels**
Address City IN Zip: **Fort Wayne, In**
CP: **F003-14978**
Plt ID: **P-003-00011**
Reviewer: Walter Habeeb
Date: Nov. 29, 2001

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	1.343E-04	7.674E-05	4.796E-03	1.151E-01	2.174E-04

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	3.197E-05	7.034E-05	8.953E-05	2.430E-05	1.343E-04

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler

Company Name: **Slater Steels**
Address City IN Zip: **Fort Wayne, In**
CP: **F003-14978**
Plt ID: **P003-00011**
Reviewer: Walter Habeeb
Date: Nov. 29, 2001

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
57.1	500.2

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.5	1.9	0.2	25.0	1.4	21.0

*PM emission factor is filterable PM only. PM10 emission factor is condensable and filterable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

See page 2 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler
HAPs Emissions

Company Name: **Slater Steels**
Address City IN Zip: **Fort Wayne, In**
CP: **F003-14978**
Plt ID: **P-003-00011**
Reviewer: Walter Habeeb
Date: Nov. 29, 2001

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	5.252E-04	3.001E-04	1.876E-02	4.502E-01	8.503E-04

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	1.250E-04	2.751E-04	3.501E-04	9.504E-05	5.252E-04

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.